

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2018-202-E - ORDER NO. 2018-803
DECEMBER 12, 2018

IN RE: Petition of Duke Energy Carolinas, LLC and)	ORDER APPROVING
Duke Energy Progress, LLC for Approval of)	TRANCHE 1 AND
CPRE Queue Number Proposal, Limited)	GRANTING REQUESTED
Waiver of Generator Interconnection)	WAIVERS WITH
Procedures, and Request for Expedited)	CONDITIONS
Review)	

This matter comes before the Public Service Commission of South Carolina (“Commission”) on the petition of Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively “Duke” or “Utilities”) seeking approval of its Competitive Procurement of Renewable Energy (“CPRE”) Program. The CPRE program is legislated by North Carolina House Bill 589 (North Carolina Session Law 2017-192), promulgated through N.C. Gen. Stat. § 62-110.8(a) and North Carolina regulation 4 NCAC 11.R8-71, and has been administered through the North Carolina Utilities Commission (“NCUC”). Duke also seeks waiver of South Carolina Generator Interconnections Procedure Sections 1.6, 3, 4.2, and 4.3 to accommodate this extensive program, which amends North Carolina’s Renewable Energy and Energy Efficiency Portfolio Standard, N.C. Gen. Stat. § 62-133.8. The other parties in this docket included the Office of Regulatory Staff (“ORS”)¹ and intervenors Interstate Renewable Energy

¹ ORS is an automatic party under S.C. Code Ann. § 58-4-10(B)

Council, Inc., Ecoplexus, Inc., South Carolina Solar Business Alliance, Inc., and Duke Energy Renewables, Inc.

As a general matter, renewable power producers (qualifying facilities²) of 80 megawatts or less are subject to individual state jurisdiction under 16 U.S.C. § 824a-3.³ This provision of the Public Utility Regulatory Policy Act (“PURPA”) requires that the rates for such purchase shall be just and reasonable to the electric consumers of the electric utility and in the public interest.⁴

PURPA also, along with 18 C.F.R. § 292.303, requires utilities to both interconnect with renewable power producers, regardless of location within a state, and purchase power from those producers in a nondiscriminatory manner.⁵ State jurisdiction in South Carolina over the interconnection and purchase of renewable energy is governed by Act 236, as well as, *inter alia*, S.C. Code Ann. § 58-27-460(A), S.C. Code Ann. §§ 58-39-110 through 58-39-150 (and other provisions), Order No. 81-214 (March 20, 1981) implementing PURPA, Order No. 85-347 (August 2, 1985) implementing Section 210 of PURPA, and the South Carolina Generator Interconnection Procedures issued by Order No. 2016-191 (April 26, 2016).

² 18 C.F.R. § 292.101(b)(1).

³ *See also* 16 U.S.C. §§ 2621 and 824i.

⁴ 16 USC 824a-3 (b)(1). The CPRE program is represented to be designed to both lower the cost of purchased power from PURPA-qualifying facilities and increase the rate at which those projects are approved, which would appear to be consistent with the public interest and just and reasonable to electric consumers as required by this provision. Therefore, this Commission will expect the CPRE program to be managed in such a way as to further the goals of PURPA rather than hinder them.

⁵ *See also* 18 C.F.R. § 292.101(b)(6); S.C. Code Ann. § 58-39-120(B).

OVERVIEW OF THE CPRE PROPOSAL

The North Carolina CPRE program was created for the purpose of adding renewable energy to the North Carolina generation portfolio.⁶ Duke claims the program will allow it to identify geographic locations that will permit the most cost-effective integration of new renewable energy resources into its electric grid. According to the Petition and subsequent comments, Section II of N.C. Gen. Stat. § 62-110.8 creates a paradigm that allows DEC and DEP to competitively procure 2,660 MW of renewable energy in aggregate between their North Carolina and South Carolina jurisdictional territories. Duke seeks to accomplish this in South Carolina through a procedure involving an “independent administrator” chosen by the North Carolina Utility Commission that processes voluntary requests for proposal (“RFP”) over a forty-five (45) month period.⁷

Tranche Proposal to Implement CPRE:

According to Duke, on October 5, 2018, the NCUC issued its Order Approving Interim Modifications to North Carolina Interconnection Procedures for Tranche 1 of CPRE RFP (“NCUC CPRE Grouping Study Order”), approving the Companies’ proposal to implement the grouping study for the program. The Utilities plan to initially procure approximately 600 MW in DEC territory and up to 80 MW in DEP territory during the

⁶ N.C. Gen. Stat. § 62-110.8(a).

⁷ Petition at 6; Duke cites to *Order Approving the Independent Administrator of the CPRE Program*, NCUC Docket No, E-100, Sub 151 (Jan. 9, 2018); 4 NCAC 11.R8-71(b)(9), for this information.

first CPRE Program RFP solicitation.⁸ The Utilities agree with other parties in this Docket that there will likely be “lessons learned” during the Tranche 1 CPRE implementation, and agree that additional South Carolina-focused stakeholder discussions would be appropriate immediately after Tranche 1 and before the Tranche 2 solicitation commences.⁹

CPRE “Independent Administrator”:

Under 4 NCAC 11.R8-71(c) (NCUC Regulations), Duke was required to prepare, and submit for approval, Guidelines for the implementation of its CPRE Program. According to Duke, the Utilities’ CPRE Program Guidelines were approved by the NCUC on February 21, 2018. Duke cites to those Guidelines in the Petition currently under consideration by this Commission, but has not yet filed them with the South Carolina Commission. According to Duke, the Guidelines set forth a multistep procedure of how solar projects are evaluated by the independent administrator (IA) with input from the Utilities.¹⁰

Duke states that once the independent administrator completes an initial ranking of the most cost effective proposals, DEC and DEP then evaluate those proposals to alter that ranking based on the Utilities’ assessment of system upgrade costs.¹¹ Specifically,

⁸ Duke cites to *Petition for Approval of Competitive procurement of Renewable energy Program to Implement N.C. Gen. Stat. § 62-110.8*, Attachment 1, CPRE Program Guidelines, Section 1.3, at 1, NCUC Docket Nos. E-2, Sub 1159, E-7 Sub 1156 (Nov. 27, 2017) (“CPRE Program Guidelines”) for this information.

⁹ Duke Reply Comments dated October 12, 2018, at 6.

¹⁰ See Petition at 6.

¹¹ See *id.*

“those upgrade costs are provided to the IA in order to determine whether the cost of upgrades for any proposed generating facility affects the initial ranking and makes a project no longer the most cost-effective resource to meet the solicited need.”¹² The surviving bids are then subject to a second round of ranking by the administrator, and those unselected solar projects are exempted from the rest of the CPRE process.

Duke states that once this intermediate step is complete, the Utilities select bid proposals in the order ranked by the administrator.¹³ Power purchase agreements would then be executed for those remaining solar developers, and the selected proposals proceed to complete the interconnection process.¹⁴ Duke further elaborates that to be considered an eligible participant to bid into a CPRE RFP, a developer sponsoring a CPRE proposal will be required to submit an Interconnection Request under the developer’s respective state’s interconnection procedures on or before the CPRE RFP proposal due date, and otherwise comply with the CPRE Program Guidelines.¹⁵

CPRE “Unique” Queue Number Proposal:

Ordinarily, renewable power producers are entitled to interconnect under South Carolina Generator Interconnection Procedure Sections 1.3.2 and 1.6, which specify that queue numbers are based on the original date and time stamp of the Interconnection

¹² See *Id.* Duke cites CPRE Program Guidelines, Sections 4.2, 4.3 and 4.4, at 9-11 for this information.

¹³ See Petition at 7. Duke cites CPRE Program Guidelines, Sections 4.3 and 4.4 at 10-11 for this information.

¹⁴ *Id.*

¹⁵ Duke cites CPRE Program Guidelines, Section 3.2, at 3 for this information.

Request Application Form.¹⁶ However, under the CPRE proposal, Duke maintains that to effectively implement the CPRE RFP solicitation process, it needs to supplement the ordinary procedure with a “unique Queue Position approach.”¹⁷ Specifically, Duke states it seeks “approval to establish, for each competitive RFP solicitation to be held as part of the CPRE Program, a queue position based on a ‘CPRE Queue Number’ for SC Solar Generator Interconnection Customers that elect to submit proposals into those solicitations and thereby voluntarily agree to be ‘grouped’ for study with all other Interconnection Customers in both South Carolina and North Carolina that elect to submit bids.”¹⁸

Duke argues that because the Utilities anticipate hundreds of projects bidding thousands of megawatts of new renewable energy capacity into the CPRE RFPs, the ordinary process utilized under the current South Carolina Generator Interconnection Procedures would not allow DEC and DEP to efficiently identify the most cost effective portfolio of resources that are bid into each CPRE RFP to satisfy the capacity solicited through that RFP.¹⁹ The Utilities further state that since the serial process provides for the assignment of priority rights to available transmission capacity on a first-come, first-served basis, it does not contemplate a scenario like the CPRE competitive solicitation process, which assigns priority rights to available transmission capacity to what are

¹⁶ Order No. 2016-191 (April 26, 2016), Exhibit 1, 5 – 7, 8.

¹⁷ Petition at 9.

¹⁸ Petition at 4.

¹⁹ Petition at 8.

deemed to be the most cost-effective and reliable projects selected through the RFP.²⁰ Duke states that non-participating Interconnection Customers' projects and their respective queue positions will not be impacted by this CPRE queue number proposal.²¹ Duke further states that interconnection customers not selected through the CPRE RFP process will have the option to either bid into a subsequent CPRE RFP or return to their previously established queue position under the SC GIP (with queue position priority subordinate to the projects selected through the CPRE RFP).²²

Requested South Carolina Generator Interconnection Procedure Waivers:

In order to accommodate the CPRE proposal, DEC and DEP seek waivers of South Carolina Generator Interconnection Procedure Sections 1.3.2, 1.6, 3, 4.2, and 4.3. The South Carolina Generator Interconnection Procedures, adopted by Exhibit 1 to Order No. 2016-191 (April 26, 2016), are the product of lengthy negotiations between regulators, solar developers, and utilities (including DEC and DEP). Respectively, these requested waivers pertain to the time/date stamp on the Interconnection Request Application Form for queue position, queue number assignments, a fast track process for generating facilities of certain size limits, the scoping meeting to discuss and review interconnection requests, and the System Impact Study, which evaluates the impact of a proposed interconnection on the reliability of the electric system.

²⁰ *Id.*

²¹ Petition at 11.

²² *Id.*

Specifically, the main interconnection procedures that Duke seeks waivers from are as follows:

Section 1.3.2: Date and Time-Stamp applied to the Interconnection Request Application Form²³

The original date- and time-stamp applied to the Interconnection Request Application Form shall be accepted as the qualifying date- and time-stamp for the purposes of establishing Queue Position and any timetable in these procedures.

Section 1.6: Queue Number²⁴

1.6.1 The Utility shall assign a Queue Number pursuant to Section 1.3.2. The Queue Number of each interconnection Request shall be used to determine the cost responsibility for the Upgrades necessary to accommodate the Interconnection.

1.6.2 Subject to the provisions of Sections 1.3, 1.4, and 1.5, Generating Facilities shall retain the Queue Number assigned to their initial Interconnection Request throughout the review process, including where moving through the process covered by Sections 2, 3, and 4.

According to Duke, since the applicable DEC or DEP CPRE queue Number will serve as a singular placeholder queue position for Interconnection Customers that elect to participate in the CPRE RFPs, and queue position and queue number for CPRE RFP participants will not depend on the date and time stamp of the Interconnection Request, the Utilities request waiver of these sections.²⁵ Queue position priority and cost

²³ Order No. 20160-191 (April 26, 2016), Exhibit 1 at 6.

²⁴ Order No. 20160-191 (April 26, 2016), Exhibit 1 at 8.

²⁵ Petition at 12.

responsibility for upgrades within each CPRE RFP will be determined based upon the projects identified by Duke and the IA as the most competitive through the RFP.

Section 4.2: Scoping Meeting²⁶

4.2.1 A scoping meeting will be held within ten (10) Business Days after the Interconnection Request is deemed complete, or as otherwise mutually agreed to by the parties. The Utility and the Interconnection Customer will bring to the meeting personnel, including system engineers and other resources as may be reasonably required to accomplish the purpose of the meeting. The scoping meeting may be omitted by mutual agreement in writing.

4.2.2 The purpose of the scoping meeting is to discuss the Interconnection Request and review existing studies relevant to the Interconnection Request. The Parties shall further discuss whether the Utility should perform a System Impact Study, a Facilities Study, or proceed directly to an Interconnection Agreement.

4.2.3 If the Utility, after consultation with the interconnection Customer, determines that the project should proceed to a System Impact Study or Facilities Study, the Utility shall provide the Interconnection Customer, no later than ten (10) Business Days after the scoping meeting, either a System Impact Study Agreement (Attachment 8) or a Facilities Study Agreement (Attachment 9), as appropriate, including an outline of the scope of the study or studies and a nonbinding good faith estimate of the cost to perform the study or studies, which cost shall be subtracted from the deposit outlined in Section 1.3.1.2.

4.2.4 If the Parties agree not to perform a System Impact Study or Facilities Study, but to proceed directly to an Interconnection Agreement, the Parties shall proceed to the Construction Planning Meeting as called for in Section 5.

²⁶ Order No. 20160-191 (April 26, 2016), Exhibit 1 at 18-19.

Duke states it seeks waiver of the Scoping Meeting requirement because those that participate in a CPRE RFP may proceed directly to the CPRE system impact grouping study evaluation.²⁷ The Utilities also state that if a renewable power producer is not selected through the CPRE RFP solicitation process, they would agree to hold a scoping meeting upon the Interconnection Customer electing to return to the normal process.²⁸

Section 4.3: System Impact Study²⁹

4.3.1 In order to retain its Queue Position, the Interconnection Customer must return a System Impact Study Agreement signed by the interconnection Customer within fifteen (15) Business Days of receiving an executable System Impact Study Agreement.

4.3.2 The scope of and cost responsibilities for a System Impact Study are described in the System Impact Study Agreement. The time allotted for completion of the System Impact Study shall be as set forth in the System Impact Study Agreement.

4.3.3 The System Impact Study shall identify and detail the electric system impacts that would result if the proposed Generating Facility were interconnected without project modifications or electric system modifications, or to study potential impacts, including, but not limited to, those identified in the scoping meeting. The System Impact Study shall evaluate the impact of the proposed interconnection on the reliability of the electric system, including the distribution and transmission systems, if required.

4.3.4 The System Impact Study report will provide the preliminary estimated interconnection Facilities charge, which is a preliminary

²⁷ Petition 12-13.

²⁸ Petition at 13.

²⁹ Order No. 20160-191 (April 26, 2016), Exhibit 1 at 19.

non-binding indication of the cost and length of time that would be necessary to provide the interconnection Facilities.

4.3.5 After receipt of the System Impact Study report, the Interconnection Customer shall inform the Utility in writing within 30 Business Days if it wishes to withdraw the Interconnection Request and to request an accounting of any remaining deposit amount pursuant to Section 6.3.

4.3.6 At the time the System Impact Study Report is provided to the Interconnection Customer, the Utility shall also deliver an executable Facilities Study Agreement to the Interconnection Customer. After receipt of the System Impact Study report and Facilities Study Agreement, when the Interconnection Customer is ready to proceed with the design and construction of the Upgrades and Interconnection Facilities, the Interconnection Customer shall return the signed Facilities Study Agreement to the Utility in accordance with Section 4.4.1 below.

Duke states it seeks waiver of the System Impact Study process because the timing for CPRE participants will proceed according to the CPRE Guidelines and RFP requirements.³⁰ Waiver is also requested of the portions of Section 4.3 and the System Impact Study Agreement that relate to the timing of the System Impact Study process to the extent necessary to allow the Utilities to effectuate the grouping study process.³¹ Duke further states that upon conclusion of the system impact grouping study for each CPRE RFP, successful bidders who proceed to Section 4.4 Facilities Study will be responsible for their proportionate share of assigned costs necessary for completing the

³⁰ Petition at 13.

³¹ *Id.*

system impact grouping studies.³² Duke asserts it will then execute a Facilities Study Agreement in accordance with the South Carolina Generator Interconnection Procedures.³³

Last, Duke also seeks waiver of Section 3 of the Generator Interconnection Procedures. Procedures under this section concern the Fast Track study process. Duke states it is unlikely that Interconnection Requests that qualify for the Fast Track review process under Section 3 would participate in the CPRE RFPs. However, Duke asserts it requests waiver of this section out of an abundance of caution.

System Cost Considerations:

DEC and DEP have service territories, infrastructure, and generation assets in both South Carolina and North Carolina. The electrical systems of these two companies operate on a system-wide basis, rather than being divided on a geopolitical basis. Therefore, when investments are made to the system, the costs are allocated proportionately between North Carolina and South Carolina ratepayers. As a practical matter, whether this Commission approves or disapproves the relief sought by the Utilities, South Carolina ratepayers would still be allocated a portion of the costs. At issue is whether South Carolina projects will be able to bid into the voluntary CPRE queue.

In so far as limited waiver is necessary under Sections 1.3.2, 1.6, 3, 4.2, and 4.3 of the South Carolina Generator Interconnections Procedures to allow South Carolina

³² *Id.*

³³ *Id.*

projects to bid into and enter the CPRE queue, we approve the request. The Commission grants limited waiver of Forms and Agreements and of the System Impact Study Agreement as discussed within the request. The Commission confines the ruling on this matter to approval of waivers that are strictly necessary to allow South Carolina projects to bid into and enter the Tranche 1 of the CPRE queue.

Upgrade Costs:

Subsequent to the initial request, Duke also requested that we find that upgrade costs, traditionally incorporated into the price of the solar project, instead be entered into rate base – if found reasonable and prudent – in a future rate case. Duke represented that the NCUC considered “the cost of Upgrades necessary to interconnect the most cost-effective of CPRE projects . . . ‘exemplary of the type of costs that may be recovered through base rates in a future rate case proceeding’”, and therefore asked this Commission to “expressly find – similar to the NCUC in North Carolina – that such an approach would be reasonable and in the public interest.”³⁴

We deny any consideration of such costs, or the appropriateness of seeking recovery and incorporation of such costs into rate base at this time. As indicated in the October 5th North Carolina Utilities Commission Order in Docket No. E-100, Sub-101:

³⁴ Duke Additional Reply Comments dated October 26, 2018, at 3-4. However, a review of the NCUC’s October 5th Order entitled *Order Approving Interim Modifications to North Carolina Interconnection Procedures for Tranche 1 of CPRE RFP*, in Docket No. E-100, Sub-101, (a copy of which was provided to this Commission by Intervenor First Solar), reveals that the NCUC: 1) considers the question of grid upgrade costs to be not material to, and unlikely to occur in, Tranche 1, and 2), has not approved a particular recovery mechanism for Upgrade Costs in later Tranches. In fact, the NCUC has proposed consideration of four alternatives to rate case treatment of upgrade costs. (See further discussion on pages 14-15, *infra*.)

“Based upon the submissions and statements by the parties [including Duke], the most competitive projects with the likelihood of winning in the Tranche 1 RFP should be in locations with ‘sufficient capacity that minor, if any, grid upgrades, are required to interconnect the facilities.’ Duke further indicated ‘there would not be material upgrades’ in Tranche 1, due to available capacity on both the DEP and DEC system.”

However, in that same order, the North Carolina Utilities Commission stated that the issues of cost allocation of grid upgrades warrants further consideration for future tranches of the CPRE. This Commission shares the concern of our North Carolina counterparts. While we grant waivers to the extent necessary for participation in Tranche 1, we also recognize the need for potential revision of the CPRE rules and Duke’s CPRE plan for future tranches after it gains experience through Tranche 1.

Further, with respect to future Tranches where grid upgrade costs are more likely to occur, this Commission shall evaluate the following options -- and possibly others that may be proposed by the parties -- prior to consideration of approval of such future Tranches: 1) change the CPRE participation approval in this state to remove the ability of Duke to recover grid upgrade costs in base rates; 2) change the CPRE program plan to require the initial bids to contain all of the Interconnection Customers costs; 3) revise the CPRE process to allow competitive bidders to refresh their bids based on the assessment of grid upgrades identified in Step Two of the CPRE RFP bid evaluation process; and 4) explore options for Duke to more specifically direct generators to locations on the system that will not involve major network upgrades.

COMMENTS FROM OTHER PARTIES AND COMMISSION RULINGS

Comments by other parties in the Docket have elicited concerns that are to be addressed by the following:

1. This Commission retains jurisdiction over all South Carolina CPRE projects and the disputes that arise from the CPRE Program for South Carolina solar developers.
2. Duke shall take adequate measures to ensure non-bidding interconnection requests are not negatively impacted by the requested waivers or by the Utilities' administration of the CPRE Program.
3. All non-bidding interconnection requests shall be processed and studied according to the timelines required by the South Carolina Generator Interconnection Procedures and should not be delayed or disadvantaged in any way by the concurrent processing of interconnection requests in the CPRE Program.
4. The Companies shall update and file reports with the Commission and ORS similar to those reports required by the NCUC and Public Staff in the CPRE Program Docket Nos. E-2, Sub 1159 and E-7, Sub 1156, and the North Carolina Interconnection Procedures Docket No. E-100, Sub 101.

While Tranche 1 interconnection customers that voluntarily agree to participate in the CPRE Program will of course be subject to the rules, regulations and fees of the NCUC related to the administration of the CPRE Program, Tranche 2 will not be approved without a proceeding before the Commission that defines the program and results in a framework for administering CPRE in South Carolina.

The Tranche 1 and subsequent Tranches group study must define:

1. Who participates in a group study and how they apply for the process,
2. Timelines for each step of the process,
3. How groups would be formed, and how the studies will be conducted to evaluate the impacts associated with interconnecting the group,
4. What happens if projects drop out of the study group (i.e., are restudies required and if so, when and how are they conducted), and
5. How costs will be allocated between projects in a group.

Concern exists regarding the backlog of the Utilities' existing queues that are administered under the South Carolina Generator Interconnection procedures. As a result, Duke shall report the status of its queue, the reasons for the backlog, and its plan to remedy the problem to the Commission within thirty (30) days of the date of this Order. ORS is requested to follow up with an investigation and also report on the status of the queue within thirty (30) days of the date of the Utilities' report. Duke shall follow up quarterly with a status report regarding the queue and ORS is requested to verify this update.

Concern also exists that Duke's proposal could result in undue negative impacts to South Carolina projects not bidding into the CPRE Program and the possibility that non-CPRE projects could be treated in a discriminatory manner, particularly with regard to study resources allocated between projects under the South Carolina Generator

Interconnection Procedures and projects allocated to CPRE projects. To allay this concern, the report required above shall also:

1. Indicate which projects have been bid into CPRE, which projects were selected as CPRE winners, and which projects bid into CPRE but were not selected. This information shall also be included in the semi-annual interconnection queue reports currently filed by Duke in Docket No. 2015-352-E.
2. If requested by ORS, identify the intervals for every significant milestone for every queued ahead non-CPRE project, including intervals for receipt of System Impact and Facilities Studies Agreements, for the System Impact and Facilities Studies to be completed, for when studies are completed and the Interconnection Agreement is received, and for when the Interconnection Request is received to execution of Interconnection Agreement.
3. Provide aggregate statistics on CPRE and non-CPRE projects, including:
 - The actual allocation of FTEs and person-hours devoted to the processing of CPRE and non-CPRE projects (for the transmission and distribution queues), including on a per-project and per-megawatt basis;
 - Information on Interconnection Study Intervals for System Impact Studies and Facilities Studies for CPRE versus non-CPRE projects;
 - Information on Interconnection Study Backlogs for CPRE versus non-CPRE projects; and

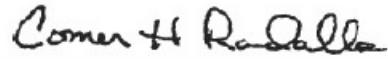
- The number of CPRE versus non-CPRE projects that achieved each significant interconnection milestone (i.e. system impact study complete, facilities study complete, IA signed, interconnection achieved) during the reporting period. This information shall also be included in the quarterly report currently provided to ORS and the SCSBA pursuant to the February 26, 2016 Memorandum of Understanding approved by the Commission in Docket No. 2015-362-E.

IT IS THEREFORE ORDERED:

1. The waivers of Sections 1.6, 3, 4.2, and 4.3 of the South Carolina Generator Interconnections Procedures sought by the Companies are granted to the extent necessary to allow participation of South Carolina projects in the CPRE Tranche 1.
2. The waivers of Forms and Agreements and of the System Impact Study Agreement as discussed within the request are granted, to the limited extent required to allow participation of South Carolina projects in the CPRE Tranche 1.
3. The Companies shall report on the status of its queues, the reasons for the backlog, and its plans to remedy the problem to the Commission within thirty (30) days of the date of this Order.
4. The Companies shall comply with all additional required reporting and monitoring activities as discussed in this Order.

5. This Order shall remain in full force and effect until further order of the Commission.

BY ORDER OF THE COMMISSION:



Comer H. "Randy" Randall, Chairman

ATTEST:



Jocelyn Boyd, Chief Clerk/Administrator